

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

No. 20-cr-390 (ENV)

JAVIER AGUILAR

**Served Via ECF On March 3, 2023**

Defendant.

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**DEFENDANT’S MOTION TO SUPPRESS  
ELECTRONICALLY STORED EVIDENCE**

Defendant Javier Aguilar moves the Court under Rule 12(b)(3)(C) of the Federal Rules of Criminal Procedure for an order suppressing all evidence seized pursuant to a search warrant for Mr. Aguilar’s emails and other electronically stored information executed on Google LLC in or around August to October 2020 and all evidentiary fruits obtained as a result of that warrant.

If the Court is not prepared to suppress on the current record, then Mr. Aguilar also moves for a prompt evidentiary hearing on this motion to be held on a date and at a time to be designated by the Court, before the Honorable Eric N. Vitaliano, at the U.S. Federal Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201.

Dated: March 3, 2023

Respectfully submitted,

**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**

By:

A handwritten signature in dark ink, appearing to be 'AS' followed by a horizontal line.

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cc: Counsel of Record (via ECF)